

NAVEX FAQ'S

1. What is an Ethics Helpline?

The Ethics Helpline is a tool you may use at any time, either through this website or over the phone, to request guidance with respect to LivaNova policies, report suspected violations of law, LivaNova's Code of Ethics or related policies, and follow up on an inquiry or report.

2. Who operates the Ethics Helpline?

LivaNova has contracted with NAVEX to administer its Ethics Helpline. Because the Ethics Helpline is administered by a third-party vendor, we can provide our employees a secure tool, 24-hour access and, if requested, anonymous report submission where permitted by local law. The Ethics Helpline website is hosted on NAVEX's servers and the phone numbers are operated by NAVEX.

3. What are the hours of service?

LivaNova's Ethics Helpline offers a secure channel – web and phone – for you to raise your concerns 24 hours a day / 7 days a week / every day of the year.

4. When should I turn to the Ethics Helpline?

When you observe behavior that you believe may violate our Code of Ethics, we expect you to voice your concerns. Ideally, you should bring any concerns forward to your manager, Human Resources, Compliance Officer, or other member of your management team. We recognize, however, that there may be circumstances when you are not comfortable talking directly with management regarding your concerns. For this reason, we have partnered with NAVEX to provide an additional channel for raising concerns or asking questions.

5. Why should I use the Ethics Helpline?

LivaNova's success is in part based on the trust it has established with its customers, employees, shareholders and other stakeholders. Ethical lapses can damage this trust and, as a result, limit LivaNova's success. To protect that trust and help ensure our continued success, employees not only have a responsibility to act ethically but also to speak up when they are concerned that others may not be acting appropriately. The Ethics Helpline is a resource for employees with questions regarding the right thing to do, and another option to fulfill our obligation to speak up when we suspect others are not doing the right thing.

6. What types of issues should be reported?

The Ethics Helpline is designed for raising concerns or asking questions involving potential violations of the LivaNova Code of Conduct and related policies, or any applicable laws or regulations. Such potential violations could include, but are not limited to:

- Non-compliance with professional standards
- Discrimination
- Harassment
- Workplace violence
- Substance abuse
- Conflicts of interest
- Falsification of documents
- Inappropriate gifts and entertainment
- Inappropriate political activities and contributions
- Insider trading or other securities law violations
- Breaches of a customer's or LivaNova's confidentiality
- Inappropriate personal use of LivaNova's resources
- Theft
- Bribes and kickbacks
- Inappropriate client billings
- Inappropriate reporting of time or expenses
- Other potential violations of policies

7. What happens when I call the Ethics Helpline phone number?

LivaNova's Ethics Helpline is administered by a third party, NAVEX. When you place a call to the Ethics Helpline, the NAVEX Call Center agent will capture your inquiry or report, asking you to provide detailed information. You may choose to remain anonymous when speaking with the agent if you are not submitting a report from a country that prohibits anonymous reporting; however, doing so may impede our ability to adequately respond to your inquiry or investigate the matter. Therefore, you are encouraged to identify yourself. You should also be prepared, if you are willing, to provide the names of witnesses and potential victims of any alleged unethical conduct to increase the success of an investigation into your complaint. While inquiries and reports may be submitted anonymously in most cases, we cannot guarantee confidentiality or anonymity as the nature of the issue and/or related case details may reveal the identities of those involved. However, every effort will be made to maintain a high level of discretion in responding to inquiries and reports submitted through LivaNova's Ethics Helpline.

The agent will provide you with a report key and password for you to follow up on your question or your report by phone or online. Please check back with LivaNova's Ethics Helpline - select "Check Status" from the NAVEX Ethics Helpline homepage – periodically to:

- check the accuracy of the report;
- confirm acknowledgement of the report;
- find out if additional information is needed to process your inquiry/concern; and
- determine the status of the investigation.

8. What should I do once I file my report?

When you submit the report, you will be issued a report key and password. Please write it down and keep it in a safe place. We ask that you use this report key and password to return to NAVEX's website or telephone helpline within 5 business days to review any follow-up questions

or to submit more information about your report. Please continue to follow up in the system so that we can continue communicating with you.

9. How does LivaNova handle my report?

Your report will be investigated promptly, thoroughly and discreetly. All Investigations will be objective, fact based and free from personal opinion, bias or prejudice.

When making a report, please provide as much information as possible, including the name of your organization, the name of the people involved, details of the concern, supporting evidence, and any other relevant information. It is important to ensure we have sufficient detail to review and take appropriate action. If more information is required and you have provided your personal information, you may be contacted to provide further details

10. Will I face retaliation for reporting a concern through the LivaNova Ethics Helpline?

LivaNova does not tolerate any form of retaliation for raising concerns in good faith, asking questions, or participating in an investigation. Raising a concern in “good faith” means coming forward with a suspicion you believe to be true.

11. Is the LivaNova Ethics Helpline anonymous or can the company trace my call or online report?

Although it is generally easier to conduct an effective investigation if you identify yourself, where local laws permit, you may choose to remain anonymous. Please be assured that if you report your concern anonymously, there is no way for LivaNova to trace your call. NAVEX, the outside vendor that manages the system, does not use caller ID and does not record the calls. Reports from your computer would come through a secure Internet portal which does not trace or show user screen names. NAVEX also removes Internet IP addresses to ensure that anonymity in the NAVEX system is maintained. You will be given a password and “report key” after you file the report or ask a question that will allow you to go back into the system anonymously to respond to questions we may have or to see the answer to your question.

12. Who has access to my report once filed?

Information is entered directly on the NAVEX secure server to prevent any possible breach in security. NAVEX makes the information you provide available only to specific individuals within the company who are charged with reviewing the information you’ve provided, based on the subject matter of your concern or question and your location or the location of your concern.

13. If I raise a concern, will my manager or coworkers find out that I contacted LivaNova's Ethics Helpline?

Whether your report is anonymous or not, we cannot guarantee confidentiality or anonymity as the nature of the issue and/or related case details may reveal the identities of those involved. However, LivaNova’s Ethics Helpline system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named. If an individual who would otherwise receive a report is implicated in the report, it is intercepted and redirected to other appropriate individuals for resolution. In addition, every effort will be

made to maintain a high level of discretion in responding to inquiries and investigating reports submitted through LivaNova's Ethics Helpline.

Please also note that LivaNova has zero tolerance for retaliation where a concern has been raised in good faith. Retaliation may result in disciplinary action against the retaliating party, including termination.

14. Will I hear about the progress or outcome of an investigation?

To protect the privacy of all concerned, LivaNova generally cannot discuss the specifics of investigations except with management responsible for the affected business, HR and any employee directly impacted by disciplinary or remedial action. However, if you make a report to the LivaNova Ethics Helpline - even anonymously - you will be provided a unique report key and password. We urge you to contact the Ethics Helpline either by phone or online to receive updates or provide additional information that may be necessary for proper investigation of your concern.

15. What should I do if I lose my report key or password?

To preserve the security of your data, access to your report and any further communication is carefully controlled. Therefore, if you lose your report key or password, you must file a new report to obtain updates or provide additional information in connection with the initial report. In the new report, you should mention that the matter relates to a prior report.

16. Are there resources available that assist with translations if I speak or write a language other than English?

Whether an inquiry or report is submitted to the LivaNova Ethics Helpline via online or by telephone, there are translation resources available to assist with inquiries or reports made in languages other than English. If communicating over the telephone, the reporter must be able to speak the name of their preferred language in English to the LivaNova Ethics Helpline operator. The operator will conference in a translator who will then assist with capture of the inquiry or report.